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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA

ZOOM DEPOSITION OF: SHARON DORSEY

STIMULATION

IT IS STIPULATED AND AGREED by and between the parties through their respective counsel that the deposition of SHARON DORSEY may be taken on May 11, 2023, before Anne E. Miller, Commissioner and Notary Public, via Zoom.

IT IS FURTHER STIPULATED AND AGREED that it shall not be necessary for any objections to be made by counsel to any questions except as to form or leading

<p>1 questions, and that counsel for the parties may make 2 objections and assign grounds at the time of trial or 3 at the time said deposition is offered in evidence or 4 prior thereto.</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>	<p>Page 2</p> <p>1 I, Anne E. Miller, a Court Reporter of the State 2 of Alabama, acting as Commissioner, certify that on 3 this date there came before me via Zoom on May 11, 4 2023, beginning at or about 9:00 a m., SHARON DORSEY, 5 witness in the above cause, for oral examination, 6 whereupon the following proceedings were had:</p> <p>7</p> <p>8 SHARON DORSEY, 9 having been first duly sworn, was examined and 10 testified as follows:</p> <p>11</p> <p>12 THE REPORTER: Usual stipulations?</p> <p>13 MR. SEALS: We do reserve the right to read 14 and sign, if you don't mind. If you will send that to 15 me, I will get it to her and then get it to you as 16 quick as I can. Otherwise, usual stipulations are just 17 fine.</p> <p>18</p> <p>19 EXAMINATION BY MR. GOLDEN:</p> <p>20 Q. Good morning, ma'am. My name is Dale Golden. I 21 represent I. C. System in a lawsuit that you have 22 filed, and we are here today to take your deposition. 23 Could you please state your name for the record?</p>
<p>1 APPEARANCES</p> <p>2</p> <p>3 Appearng For The Plaintiff: 4 COCHRUN & SEALS, LLC Mr. W. Whitney Seals 5 300 Richard Arrington Jr Blvd North Birmingham, Alabama 35203</p> <p>6</p> <p>7 Appearng For The Defendant: 8 GOLDEN, SCAZ, GAGAIN PLLC Mr. Dale T. Golden 9 1135 Marbella Plaza Drive Tampa, Florida 33619</p> <p>10</p> <p>11</p> <p>12 Court Reporter: Anne E. Miller</p> <p>13</p> <p>14 I N D E X</p> <p>15 Examination by Mr. Golden 4 Examination by Mr. Seals 63</p> <p>16</p> <p>17 DEFENDANT'S EXHIBIT</p> <p>18 Exhibit 1 31 (Collection notice -- attached)</p> <p>19 Exhibit 2 49 (Letter -- attached)</p> <p>20 Exhibit 3 37 (Settlement offer -- attached)</p> <p>21 Exhibit 4 22 (AT&T Letter -- attached)</p> <p>22</p> <p>23</p>	<p>Page 3</p> <p>Page 5</p> <p>1 A. Yes, sir. Sharon Dorsey.</p> <p>2 Q. Ms. Dorsey, have you ever had your deposition 3 taken?</p> <p>4 A. Yes, I have.</p> <p>5 Q. How many times?</p> <p>6 A. Once.</p> <p>7 Q. And what was that in relation to?</p> <p>8 A. Well, twice. When my husband -- when my husband 9 passed away, I had to do a deposition for an insurance 10 company. And then I had a dog bite that they did a 11 deposition for that.</p> <p>12 Q. All right.</p> <p>13 A. That was several years ago.</p> <p>14 Q. So you understand that -- anyway, at least 15 generally that's what's going to happen today. I'm 16 just going to ask you a number of questions, and the 17 court reporter is going to take down everything that is 18 said. So please just try to make sure that I'm 19 finished asking my question before you start to answer.</p> <p>20 A. Yes.</p> <p>21 Q. And I will do the same with you so that we can 22 make the court reporter's job as easy as possible.</p> <p>23 Okay?</p>

<p style="text-align: right;">Page 6</p> <p>1 A. Okay.</p> <p>2 Q. What did you do to prepare for your deposition</p> <p>3 today, ma'am?</p> <p>4 A. I read over some documents that I had recently</p> <p>5 received and just -- I'm very familiar with my case.</p> <p>6 It's been going on long enough that I didn't have to do</p> <p>7 much preparation.</p> <p>8 Q. What documents did you review?</p> <p>9 A. Some answers on the I. C. Systems, questions</p> <p>10 from my attorney. I looked at those. Just all the</p> <p>11 documents that I have, all the letters that we sent out</p> <p>12 and that kind of thing.</p> <p>13 Q. Did you listen to any call recordings?</p> <p>14 A. Call recordings?</p> <p>15 Q. Yes.</p> <p>16 A. No, not to prepare for the case. No.</p> <p>17 Q. Have you ever heard call recordings in this</p> <p>18 case?</p> <p>19 A. Yes, I have.</p> <p>20 Q. How long ago was that?</p> <p>21 A. A few weeks ago.</p> <p>22 Q. The call recordings, were they conversations</p> <p>23 between you and employees of I. C. System?</p>	<p style="text-align: right;">Page 8</p> <p>1 time, let's say, back in 2021?</p> <p>2 A. No, sir.</p> <p>3 Q. How many different telephone numbers do you</p> <p>4 have?</p> <p>5 A. Two.</p> <p>6 Q. And what are those two telephone numbers? I</p> <p>7 promise I won't file them with the court.</p> <p>8 A. [REDACTED] -- I don't use this one, but I hope I'm</p> <p>9 correct. [REDACTED] And then [REDACTED]. That's</p> <p>10 the number I use most frequently.</p> <p>11 Q. Is the [REDACTED] number a cell phone number or a land</p> <p>12 line?</p> <p>13 A. It's not a land line or a cell number. It's a</p> <p>14 satellite phone.</p> <p>15 Q. Are you a secret agent?</p> <p>16 A. No. No, sir.</p> <p>17 Q. You have a satellite phone. That's a new one</p> <p>18 for me.</p> <p>19 A. Well, the land lines weren't available at the</p> <p>20 time I applied for my telephone service at my residence</p> <p>21 where I currently live. So I was referred to Via Sat</p> <p>22 Satellite for a home phone and internet.</p> <p>23 Q. Who is that provider?</p>
<p style="text-align: right;">Page 7</p> <p>1 A. Yes.</p> <p>2 Q. Do you remember having those conversations</p> <p>3 before listening to the recordings?</p> <p>4 A. I did.</p> <p>5 Q. Where do you reside, ma'am?</p> <p>6 A. Where do I reside?</p> <p>7 Q. Yes.</p> <p>8 A. Do you want the address?</p> <p>9 Q. Yes, please.</p> <p>10 A. [REDACTED] in Blount County. I receive</p> <p>11 mail at my local post office, which is Locust Fork.</p> <p>12 Q. How long have you lived at that address?</p> <p>13 A. Five years.</p> <p>14 Q. Where did you live before then?</p> <p>15 A. [REDACTED], and then I lived with</p> <p>16 my daughter for four years before I moved to this</p> <p>17 current address.</p> <p>18 Q. Where is that [REDACTED] address, what</p> <p>19 town?</p> <p>20 A. What town? Remlap.</p> <p>21 Q. Is there anyone who lives with you right now?</p> <p>22 A. No.</p> <p>23 Q. Was there anyone that lived with you at the</p>	<p style="text-align: right;">Page 9</p> <p>1 A. Via Sat, V-i-a, S-a-t, Satellite Systems.</p> <p>2 Q. So do you have a satellite dish on your house?</p> <p>3 A. I do.</p> <p>4 Q. Me too.</p> <p>5 A. If it rains, we have no service.</p> <p>6 Q. Yeah. That's very true. Very true. I can</p> <p>7 always tell when it's about to rain at my house because</p> <p>8 it starts flashing. How long have you had that cell</p> <p>9 phone number? That's the 1146 number.</p> <p>10 A. It's the only cell phone I have ever had. So I</p> <p>11 had a bag phone first, and that was the number. And</p> <p>12 then I have had this number, I would say, 25 years, 30</p> <p>13 maybe.</p> <p>14 Q. I feel like the two attorneys in the room there</p> <p>15 aren't old enough like you and me to remember what a</p> <p>16 bag phone is.</p> <p>17 MR. SEALS: I had a bag phone, yes, I did.</p> <p>18 And a flip phone.</p> <p>19 MR. GOLDEN: I couldn't afford a bag phone</p> <p>20 when they were available. I didn't get a cell phone</p> <p>21 until after I got out of law school.</p> <p>22 MR. SEALS: There you go.</p> <p>23 Q. (BY MR. GOLDEN) What is your educational</p>

<p>1 background?</p> <p>2 A. I graduated from high school in 1967. I</p> <p>3 graduated from Birmingham School of Practical Nursing</p> <p>4 in 1970. And that's -- that's basically it, other than</p> <p>5 CEU's and that kind of thing that's required of me.</p> <p>6 Q. So what degree did you get from Birmingham?</p> <p>7 A. Licensed practical nurse.</p> <p>8 Q. Where do you work now?</p> <p>9 A. I'm 70 -- I will be 74 in July, and I work two</p> <p>10 days a week for Dollar General in my community.</p> <p>11 Q. How long have you been working with Dollar</p> <p>12 General?</p> <p>13 A. Since February.</p> <p>14 Q. And I want the record to reflect I did not ask</p> <p>15 you how old you were, okay?</p> <p>16 A. Okay.</p> <p>17 MR. SEALS: Noted.</p> <p>18 Q. (BY MR. GOLDEN) My assumption is that at some</p> <p>19 point you put that LPN to use and went into the</p> <p>20 healthcare industry; is that right?</p> <p>21 A. That's correct.</p> <p>22 Q. How long did you work in the healthcare</p> <p>23 industry?</p>	<p>Page 10</p> <p>1 A. I was sick for five years. And then after my</p> <p>2 illness, after I got better, I went to work for</p> <p>3 Allstate Insurance.</p> <p>4 Q. What did you do for Allstate?</p> <p>5 A. The first ten years, I was a QBP contractor,</p> <p>6 home repairs from storms, fires, that kind of thing.</p> <p>7 And then they hired me full time as a property field</p> <p>8 inspector.</p> <p>9 Q. Were you adjusting claims?</p> <p>10 A. At times, yes. I had to be my own adjuster on</p> <p>11 many of the claims that I serviced and worked. But I</p> <p>12 actually estimated property values the last 16 years.</p> <p>13 Q. How long did you work for Allstate?</p> <p>14 A. A total of about 25 years.</p> <p>15 Q. Were you involved with dealing with customers</p> <p>16 then on a regular basis, insureds?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Did you work after you left Allstate?</p> <p>19 A. I did. I worked as a licensed practical nurse</p> <p>20 again at Oneonta City Schools for three years, three</p> <p>21 terms. And then I worked through St. Vincent's</p> <p>22 Hospital. St. Vincent's lost the contract so there was</p> <p>23 no job for me. And before I got home on the same day,</p>
<p>1 A. Ten years.</p> <p>2 Q. Was that right after you got that degree?</p> <p>3 A. Yes.</p> <p>4 Q. And what did you do after you started working in</p> <p>5 the healthcare industry?</p> <p>6 A. I went to work for an insurance company.</p> <p>7 Q. Which insurance company?</p> <p>8 A. Liberty -- I'm sorry -- Mutual Savings for ten</p> <p>9 years.</p> <p>10 Q. And what did you do for that insurance company?</p> <p>11 A. I worked a debit. I was a debit agent, a home</p> <p>12 debit agent.</p> <p>13 Q. What does that mean?</p> <p>14 A. That means that I serviced the policies that</p> <p>15 were on the books when I started. I wrote new</p> <p>16 insurance, and I collected monthly premiums from door</p> <p>17 to door.</p> <p>18 Q. So I was going to ask that. So you went out?</p> <p>19 A. Yes.</p> <p>20 Q. How long did you work for that insurance</p> <p>21 company?</p> <p>22 A. Ten years.</p> <p>23 Q. And then what did you do after that?</p>	<p>Page 11</p> <p>1 I was called by Blount County Board of Education, and I</p> <p>2 worked at Hayden Elementary School for two terms.</p> <p>3 Q. And was that in the capacity of a nurse?</p> <p>4 A. School nurse, correct.</p> <p>5 Q. That was for about a total of about six years,</p> <p>6 if my math is good?</p> <p>7 A. Five.</p> <p>8 Q. Five. What did you do after Hayden Elementary?</p> <p>9 A. I moved to the residence where I am now, next</p> <p>10 door to my friend of 47 years who was diagnosed with</p> <p>11 Parkinson's Disease. And I took care of her until she</p> <p>12 passed in January of '22.</p> <p>13 Q. Now how would you describe the area where you</p> <p>14 live now? Is it rural?</p> <p>15 A. Rural, yes, sir.</p> <p>16 Q. And give me an example. How close is your</p> <p>17 closest neighbor?</p> <p>18 A. Within sight of my home because I put it right</p> <p>19 next to my friend that was sick. So I have neighbors</p> <p>20 that I can see across the street and one on the left of</p> <p>21 me, but that's the only ones that I can see from my</p> <p>22 house.</p> <p>23 Q. Both my parents grew up on farms in Wisconsin.</p>

4 (Pages 10 - 13)

<p style="text-align: right;">Page 14</p> <p>1 So, yeah, that was an interesting thing to go to the 2 farm because there was a lot of space. And that's one 3 of the things that I really liked about going to the 4 farm.</p> <p>5 A. That's what I like where I live, a lot of space.</p> <p>6 Q. A lot of space. So do you think you have any 7 problems with your memory?</p> <p>8 A. No, sir.</p> <p>9 Q. You haven't been diagnosed with any sort of 10 memory issues or anything like that?</p> <p>11 A. No, sir. They said I scored an A plus on each 12 one of my Medicare checkups.</p> <p>13 Q. Now as I said at the beginning of this, my 14 client's name is I. C. System. Do you remember -- do 15 you know who that company is?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And how do you know that company?</p> <p>18 A. I got very familiar with them in the last couple 19 of years because they called me. I got letters from 20 them saying that they were trying to collect a debt.</p> <p>21 Q. Is it your understanding that I. C. System is a 22 bill collector?</p> <p>23 A. Yes.</p>	<p>1 A. No, sir. I returned the letter that they sent 2 me with my dispute attached to that letter, telling 3 them that it was a debt I did not owe. But I don't 4 remember the exact time frame.</p> <p>5 Q. Now what was the account that I. C. System was 6 attempting to collect from you?</p> <p>7 A. It was for AT&T, and I had contracted with AT&T 8 to have a package deal. And they called it a U-Verse 9 account where they would put my home phone, my internet 10 and DirecTV. It was a bundled account. And that was, 11 I think, on the 18th when I contracted with them. A 12 few days after that, prior to -- just a couple of days 13 before the installation date, AT&T called me and said 14 they are so sorry, but the U-Verse account was not 15 available in my rural area. So they referred me out to 16 Via Sat Satellite for my internet and my home phone, 17 and then I did sign up with DirecTV because that was 18 available there.</p> <p>19 Q. So the AT&T U-Verse service, that wasn't going 20 to be a satellite service?</p> <p>21 A. No, sir. It was supposed to be a U-Verse 22 bundled package of some sort.</p> <p>23 Q. Was it supposed to be cable or was it some sort</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Now other than I. C. System, have you been 2 contacted by any other bill collectors in your life?</p> <p>3 A. Just one prior to I. C. System for the same 4 thing, for AT&T. And I wrote them a letter of dispute, 5 and they wiped it off. Then the next thing I know, I'm 6 getting letters from another collection agency for the 7 same debt that I did not owe.</p> <p>8 Q. So prior to I. C. System contacting you about 9 this AT&T debt, there was another collection agency?</p> <p>10 A. Yes, for AT&T, trying to collect the same debt.</p> <p>11 Q. Do you remember the name of that agency?</p> <p>12 A. No, sir. I got one letter from them, and I 13 wrote a letter of dispute back. And I never heard from 14 them again.</p> <p>15 Q. How long after you sent that letter to the first 16 collector did you hear from I. C. System? Do you know?</p> <p>17 A. Not sure about the exact time, but it was just a 18 few months.</p> <p>19 Q. Did you receive letters from I. C. System? Do 20 you recall that?</p> <p>21 A. I did.</p> <p>22 Q. Now do you recall generally when that was when 23 you got the first letter?</p>	<p>1 of -- do you know?</p> <p>2 A. I'm not sure. No, sir.</p> <p>3 Q. Fair enough. I'm not sure either. So if I 4 understand correctly, it's your testimony that the AT&T 5 U-Verse service was never actually even installed at 6 your house; is that right?</p> <p>7 A. No, sir. It was not available there so it would 8 have been impossible to get it.</p> <p>9 Q. Now how did you find this AT&T U-Verse service?</p> <p>10 A. When I lived with my daughter, she had U-Verse, 11 and it was just a couple of miles from where I moved. 12 So when I was moving into my new house, I called AT&T, 13 and they said, "Oh, yes. We have a package that we can 14 write you for a new customer." And it was to be 101 a 15 month for all three services; the home phone, the 16 internet and the DirecTV.</p> <p>17 Q. I think you might have answered this, but I want 18 to make sure. So what do you have now in terms of 19 internet, TV and phone?</p> <p>20 A. I have DirecTV.</p> <p>21 Q. Okay.</p> <p>22 A. And I have Via Sat Satellite for the other two.</p> <p>23 Q. Now I remember.</p>

<p style="text-align: right;">Page 18</p> <p>1 A. That's okay.</p> <p>2 Q. So did you receive an actual bill from AT&T</p> <p>3 then?</p> <p>4 A. Yes, sir. For the first month, I received a</p> <p>5 bill for the 101. I think it was 101.33. And so I</p> <p>6 called them immediately and told them that I didn't</p> <p>7 receive the service and that I didn't owe for that</p> <p>8 service. And they always said, "Oh, we are so sorry.</p> <p>9 We will take care of that."</p> <p>10 Q. Was it just one bill that you received?</p> <p>11 A. No, sir. I received bills from AT&T through</p> <p>12 November of 2018.</p> <p>13 Q. So if I understand correctly, you got the first</p> <p>14 bill. You called them. They said, "Oops, sorry. We</p> <p>15 didn't mean to send you that" or something like that.</p> <p>16 And you were like that's good, and then they sent you</p> <p>17 another bill and another bill. How many bills do you</p> <p>18 think you got from AT&T?</p> <p>19 A. I got them monthly from the first one that I got</p> <p>20 in June, July, August, September, October. And the</p> <p>21 last one was a letter telling me if I did not pay that</p> <p>22 I would be turned over to a collection agency, and we</p> <p>23 sent you a copy of that letter.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. You called immediately, and the person</p> <p>2 apologized. And I assume you took that to mean, well,</p> <p>3 okay, this means they recognize their mistake and they</p> <p>4 are not going to bill me for this, right?</p> <p>5 A. Yes, sir. That's what I thought.</p> <p>6 Q. And then they sent you another bill the next</p> <p>7 month?</p> <p>8 A. Yes.</p> <p>9 Q. And if I understand correctly, you called again?</p> <p>10 A. Each time I got a bill, I called them. And</p> <p>11 sometimes I was on the phone for two hours, trying to</p> <p>12 -- sometimes you got someone that didn't speak English</p> <p>13 and could not really help you because you don't know</p> <p>14 what they are saying. So sometimes I had to call four</p> <p>15 or five times in the same day before I could get</p> <p>16 someone that I could relate with because of the</p> <p>17 language barrier.</p> <p>18 Q. And in any of those conversations after that</p> <p>19 initial one, did you come away from the conversation</p> <p>20 thinking, "Well, now this is resolved"?</p> <p>21 A. Yes, sir. Probably each time I talked to AT&T,</p> <p>22 I thought, "Okay. This is the last time I will have to</p> <p>23 be on the phone for two hours trying to resolve this."</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. How many conversations did you have with someone</p> <p>2 from AT&T directly?</p> <p>3 A. Every month. And then for months after I got</p> <p>4 the letter that says they were going to turn me over to</p> <p>5 a collection agency, I called them frequently to make</p> <p>6 sure that they did not do that because I was trying to</p> <p>7 rebuild my credit after my husband's death.</p> <p>8 Q. And was the -- were the substances of those</p> <p>9 conversations pretty much the same each time you</p> <p>10 called?</p> <p>11 A. Yes, sir.</p> <p>12 Q. And that was what?</p> <p>13 A. That you weren't able to provide the service to</p> <p>14 me so how can I owe you this 101.33. I'm not going to</p> <p>15 pay it because I didn't receive the service. That was</p> <p>16 essentially the conversation each time I called them.</p> <p>17 Q. And what was the response from AT&T?</p> <p>18 A. They would update my files each time.</p> <p>19 Q. Did AT&T indicate -- I mean, I know that you had</p> <p>20 indicated earlier that during the initial conversation</p> <p>21 when you got that bill in June, I think you said, June</p> <p>22 '18?</p> <p>23 A. Yes, sir.</p>	<p style="text-align: right;">Page 21</p> <p>1 Q. And then the next month the bill would come.</p> <p>2 That happened all the way to November, when you got the</p> <p>3 letter talking about how they were going to refer it to</p> <p>4 collections, right?</p> <p>5 A. Yes, sir.</p> <p>6 Q. And you called AT&T after getting that letter</p> <p>7 too?</p> <p>8 A. Yes, sir, I did. I made some notes on the one</p> <p>9 we sent you on that letter when I talked to two people,</p> <p>10 I think.</p> <p>11 Q. This is where it's going to get tricky for me.</p> <p>12 I'm going to try to share my screen. I'm trying to</p> <p>13 figure out what I did with that -- just give me --</p> <p>14 MR. SEALS: Do you have a copy of that</p> <p>15 letter?</p> <p>16 Q. (BY MR. GOLDEN) So do you see my -- do you see?</p> <p>17 A. Yes, sir. I do see it.</p> <p>18 Q. Okay. Good. I have accomplished something</p> <p>19 already this morning.</p> <p>20 MR. SEALS: Mr. Golden, she has her</p> <p>21 original in her hand too so she can go along with you.</p> <p>22 Q. (BY MR. GOLDEN) So if I understand correctly,</p> <p>23 this is the last bill that you got from AT&T; is that</p>

<p>1 right?</p> <p>2 A. Yes, sir.</p> <p>3 Q. On this account, okay. And this is the one that</p> <p>4 -- let me see here. It says -- all right. And it says</p> <p>5 if you look at one, two, three, fourth paragraph,</p> <p>6 reading this, it says, "If you do not pay the total</p> <p>7 balance by the due-by date, your account may be</p> <p>8 referred to an outside collection agency"?</p> <p>9 A. Yes, sir.</p> <p>10 Q. And it says, "The outside collection agency may</p> <p>11 report your debt to credit bureaus which may affect</p> <p>12 your credit standing," right?</p> <p>13 A. Yes.</p> <p>14 Q. And just to state the obvious, the handwriting</p> <p>15 on here, on this -- we are going to call this Exhibit 4</p> <p>16 actually because I have three other ones that I already</p> <p>17 labeled. So this is your handwriting, right?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Okay. And so at the top there, there is a date</p> <p>20 of 11/27/18. What is that?</p> <p>21 A. That was the date of my conversation with them.</p> <p>22 Q. All right. And what is the handwriting that</p> <p>23 precedes that date and Angela?</p>	<p>Page 22</p> <p>1 note is there.</p> <p>2 A. When I spoke with Monique and I went over all</p> <p>3 that with her, she said that I owe it and I have to pay</p> <p>4 it. So I couldn't make her understand I did not get</p> <p>5 this service. So sick of this.</p> <p>6 Q. So you spoke with Monique from AT&T on November</p> <p>7 27th of 2018. You explained the same story. I don't</p> <p>8 want to characterize it that way, but you told her what</p> <p>9 had happened. Did you tell her that you had spoken</p> <p>10 with other representatives of AT&T?</p> <p>11 A. Yes, sir. And she -- I asked her to look at</p> <p>12 their notes because each time that I spoke with them, I</p> <p>13 asked them to make notes about my account because I did</p> <p>14 not receive the service. And it was a billing error,</p> <p>15 and she -- I can't remember if she said she sees the</p> <p>16 note. Sometimes they did tell me they see the note and</p> <p>17 they are sorry it hasn't been resolved. But on this</p> <p>18 particular day, she told me that I owed that and that I</p> <p>19 have to pay it.</p> <p>20 Q. Now that conversation was in November of 2018.</p> <p>21 So it's what? Four and a half years. Do you remember</p> <p>22 that really well today?</p> <p>23 A. The conversation?</p>
<p>1 A. Angel, that was -- that was the name of the</p> <p>2 person that I was speaking to with that conversation.</p> <p>3 Q. Okay. And so then below that, it indicates -- I</p> <p>4 think that's Monique, right?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Do you remember having a conversation with</p> <p>7 Angel?</p> <p>8 A. Yes, sir. And she referred me to someone else</p> <p>9 that would help me with that, getting that cleared up,</p> <p>10 which was Monique. We were making calls on the same</p> <p>11 day.</p> <p>12 Q. So I want to make sure I understand. Did Angel</p> <p>13 transfer your call to Monique?</p> <p>14 A. Yes, sir, I believe so.</p> <p>15 Q. After you waited for an hour or so?</p> <p>16 A. Yes, sir.</p> <p>17 Q. All right. And so you spoke with Monique, and</p> <p>18 then there are notes that you wrote underneath that,</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. On Exhibit 4 here?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Okay. And so if you could read me what your</p>	<p>Page 23</p> <p>1 Q. Yeah.</p> <p>2 A. Pretty much. She -- I think that Monique may</p> <p>3 have been somebody in billing or a supervisor or</p> <p>4 someone. And when she read -- I asked her to read all</p> <p>5 the notes, and she said that I would owe that, that I</p> <p>6 did owe that, and I would need to pay it. That I would</p> <p>7 have to pay it or it would be turned over to a</p> <p>8 collection company for them.</p> <p>9 Q. If I understand correctly, every conversation</p> <p>10 you had with AT&T before that, they were apologetic,</p> <p>11 right?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And then this time, it was you owe the money,</p> <p>14 right?</p> <p>15 A. Yes, sir.</p> <p>16 Q. And so that was -- was that surprising to you?</p> <p>17 A. Yes, sir. I tried to explain to her that the</p> <p>18 other people were supposed to update my record. And</p> <p>19 she said that she did see some notes, but there was no</p> <p>20 reason for her to tell me that I didn't owe it because</p> <p>21 it was on there that I did owe it. So that was the end</p> <p>22 of that, and I didn't get another bill after this bill.</p> <p>23 I don't believe I got another one.</p>

<p style="text-align: right;">Page 26</p> <p>1 Q. And so that conversation with Monique would have 2 been the last conversation you had with someone from 3 AT&T regarding this account?</p> <p>4 A. No, sir. I called after that just to make sure 5 and even pleaded with someone not to turn me over to a 6 collection agency because I was trying to rebuild my 7 credit after my husband's death.</p> <p>8 Q. So if I understand correctly, you had this 9 conversation from Monique. And I assume when that 10 conversation ended, you were concerned, right?</p> <p>11 A. I was upset. I was mad.</p> <p>12 Q. Right. Because now AT&T was taking the position 13 you did owe the debt, right?</p> <p>14 A. Yes, sir.</p> <p>15 Q. And so if I understand correctly, you then at 16 some point, November 27th of 2018, placed another call 17 to AT&T; is that right?</p> <p>18 A. Yes, sir. I probably placed several in the 19 months to come. And then when I got the letter from 20 the collection agency, I called AT&T and had a 21 screaming, hysterical fit.</p> <p>22 Q. Okay. We'll get to that.</p> <p>23 A. Okay.</p>	<p style="text-align: right;">Page 28</p> <p>1 Systems.</p> <p>2 Q. So I know you don't have a copy of the letter 3 that you received from that first collection agency, 4 right?</p> <p>5 A. No, sir. I don't.</p> <p>6 Q. Do you have an idea of how long after you 7 received -- let's say how long after you had this 8 conversation with Monique in late September of 2018 9 that you heard from the first collection agency?</p> <p>10 A. Oh, it was probably months before I got anything 11 from the collection agency, but I continued to call 12 AT&T to see what the status was. Some of them were 13 very helpful. A couple of them told me that it had 14 been turned over to a collection agency, and I would 15 each time say, "Please don't do that. I'm trying to 16 rebuild my credit."</p> <p>17 Q. After the telephone conversation with Monique 18 and before you were contacted by I. C. System, how many 19 telephone calls do you think you had with someone from 20 AT&T?</p> <p>21 A. Quite a few probably because I checked 22 frequently to see what the status of that account was 23 because she told me that it was going to go on my</p>
<p style="text-align: right;">Page 27</p> <p>1 Q. But after this November 8, 2018, letter, you 2 didn't receive any other bills from AT&T. Is that 3 right?</p> <p>4 A. That's correct.</p> <p>5 Q. But you were still concerned because you were 6 told in that conversation with Monique that you owed 7 the money?</p> <p>8 A. That's correct.</p> <p>9 Q. And so if I understand correctly, the next bit 10 of, I guess, mail that you got on this account was from 11 a collection agency, right?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And I don't -- I'm sorry. I don't remember if 14 you had told me that you recalled the name of that 15 other collection agency or not?</p> <p>16 A. No, sir. I don't recall it. I only had the one 17 letter from them. And on the bill that they sent me 18 for that AT&T bill, I wrote a dispute letter and told 19 them the circumstances of why I did not owe it. And 20 then I did not receive anything else from that company.</p> <p>21 Q. I'm sorry. I didn't mean to cut you off.</p> <p>22 A. That's okay. A few -- maybe three or four 23 months later, I received the first letter from I. C.</p>	<p style="text-align: right;">Page 29</p> <p>1 credit report. And so I have some credit counseling 2 from Credit Karma, and they have this little girl there 3 that's a computer-generated thing. Her name is Penny, 4 and you can ask questions. And then she will -- she 5 will answer them. And so the first idea that I had 6 that I. C. Systems had the account was I got that 7 little message from Penny saying there was a collection 8 account on my credit report. And I think that was the 9 beginning -- the latter part of '19 -- and don't hold 10 me to the dates because I'm not sure -- or maybe the 11 first of 2020.</p> <p>12 Q. So if I understand correctly, you were concerned 13 about your credit report. And so you had apparently 14 signed up for Credit Karma, right?</p> <p>15 A. I don't remember signing up with Credit Karma, 16 but they actually sent me an email telling me what was 17 available with them. And I just punched in and started 18 talking to them, and then they made recommendations how 19 to build my credit. And then I got the email from 20 Penny, which I don't think is a person. I think it's 21 just you talk to the computer when you type in there. 22 And they let me know that I did have a collection from 23 I. C. Systems on my credit report, that it needed some</p>

<p>1 work.</p> <p>2 Q. Okay. So if I understand correctly, it was</p> <p>3 through this Credit Karma and this whatever Penny is?</p> <p>4 A. Yes.</p> <p>5 Q. You were notified that I. C. System had put</p> <p>6 something on your credit report?</p> <p>7 A. Yes, sir.</p> <p>8 Q. Okay. So if I understand correctly -- well, let</p> <p>9 me make sure I understand correctly. You got a letter,</p> <p>10 I believe you said, from the first collection company,</p> <p>11 right?</p> <p>12 A. Yes, sir.</p> <p>13 Q. And you had a conversation with someone there?</p> <p>14 A. Not verbally, no, sir. I wrote a letter of</p> <p>15 dispute and attached it to the letter they sent to me</p> <p>16 and mailed it back to them.</p> <p>17 Q. So you received the letter. You mailed that</p> <p>18 letter along with your letter of dispute back to that</p> <p>19 agency?</p> <p>20 A. Yes, sir. And I gave all the details about why</p> <p>21 AT&T was billing me and it was for a service I could</p> <p>22 not receive because it was not available in my area.</p> <p>23 And I never got anything else from that group of</p>	<p>Page 30</p> <p>1 A. Okay.</p> <p>2 Q. If you look down towards the bottom here, was</p> <p>3 that the address you lived at at that time?</p> <p>4 A. That is my mailing address where I receive my</p> <p>5 mail.</p> <p>6 Q. Okay. Right. That's the P. O. Box you were</p> <p>7 talking about?</p> <p>8 A. Yes, sir.</p> <p>9 Q. So that's your mailing address. So that would</p> <p>10 have been the one that this letter was sent to, and you</p> <p>11 remember receiving this letter, right?</p> <p>12 A. Well, I got more than one letter from I. C.</p> <p>13 System. So I remember getting letters from I. C.</p> <p>14 System, and I called them when I got the letters. And</p> <p>15 I wrote letters of dispute to them as well four times</p> <p>16 about that. So I don't know if this is the first</p> <p>17 letter I got. I don't think it is the first letter I</p> <p>18 got.</p> <p>19 Q. Why do you believe it's not the first letter?</p> <p>20 A. Well, because of the date. Because I think that</p> <p>21 I. C. Systems appeared on my credit report the latter</p> <p>22 part of 2020. And I'm not certain about those dates,</p> <p>23 but I believe it was the end of 2020.</p>
<p>1 collectors.</p> <p>2 Q. All right. So then they never called you or</p> <p>3 anything like that?</p> <p>4 A. No, sir, not that company. I only got one</p> <p>5 letter from them.</p> <p>6 Q. And you wrote a letter back, disputing the debt.</p> <p>7 And then you never heard from them again?</p> <p>8 A. No, sir.</p> <p>9 Q. Is that right? Am I right?</p> <p>10 A. Yes, sir.</p> <p>11 Q. Let me see if I can switch. Now do you see a</p> <p>12 different letter on your screen now?</p> <p>13 A. Yes, sir.</p> <p>14 Q. Okay. And this one is marked Exhibit 1. It's</p> <p>15 dated 1/8/2021. Do you see that on the left-hand side</p> <p>16 there, right under collection notice?</p> <p>17 A. Oh, I'm sorry. I was just looking at the little</p> <p>18 box. Yes, I do see that.</p> <p>19 Q. All right. Now have you seen this letter before</p> <p>20 today?</p> <p>21 A. Yes, sir. That's probably the first letter that</p> <p>22 I got from them.</p> <p>23 Q. Let me ask you a question about that.</p>	<p>Page 31</p> <p>1 Q. When you saw that I. C. System had credit</p> <p>2 reported you, did you do anything in terms of</p> <p>3 contacting anyone about that?</p> <p>4 A. I'm not sure if I called them regarding that</p> <p>5 specifically. They called me a couple of times, but</p> <p>6 I'm not sure of those dates. And I went over it very,</p> <p>7 very thoroughly with them to tell them how that</p> <p>8 occurred.</p> <p>9 Q. All right. Now when you got this letter from I.</p> <p>10 C. System, did you read it?</p> <p>11 A. Yes, I read it.</p> <p>12 Q. And maybe this sounds like a silly question, but</p> <p>13 if I get a letter, I will usually read it -- if it's</p> <p>14 important anyway -- two or three times. Did you read</p> <p>15 this more than once?</p> <p>16 A. I'm not sure about that. I'm not sure.</p> <p>17 Q. And you see the part in the letter in the middle</p> <p>18 towards the bottom where it says notice?</p> <p>19 A. Yes, sir.</p> <p>20 Q. Do you remember reading that part of this letter</p> <p>21 or not?</p> <p>22 A. I probably read all of it.</p> <p>23 Q. Okay. And do you remember if you look at -- I</p>

<p>1 think it's the second sentence under notice where it 2 says, "If you notify us in writing within 30 days from 3 receiving this notice that you dispute the validity of 4 this debt or any portion thereof, we will obtain 5 verification of the debt or obtain a copy of the 6 judgment and mail you a copy of such judgment or 7 verification."</p> <p>8 A. See down here on the very last where it says, 9 "If you make a request in writing within 30 days after 10 receiving this notice, we will provide you with the 11 name and address of the original creditor," which I 12 didn't -- I didn't write to them. I called them. And 13 I already knew who the collector was because it says 14 AT&T U-Verse, balance due 151.33, and I knew I did not 15 owe that.</p> <p>16 Q. All right. When you got this letter, the one 17 that is Exhibit 1 from I. C. System, did you talk to 18 anyone about that letter?</p> <p>19 A. Yes, sir. Whatever number they provided, I 20 called them and did speak with someone. I'm not sure 21 who. I did make a record of that.</p> <p>22 Q. And I scrolled down again.</p> <p>23 A. The toll free number.</p>	<p>Page 34</p> <p>1 Q. Now I know that we showed in this other exhibit 2 here that you had made notes about your conversation 3 with Angel and then Monique with AT&T. When you spoke 4 with anyone from I. C. System, did you make notes of 5 those conversations?</p> <p>6 A. No, sir, not that I recall. I didn't make any 7 notes. A couple of the calls when they called me, I 8 was traveling. And I talked to them from a vehicle, 9 and I didn't even make notes of the telephone 10 conversations because I was just trying to make them 11 understand I'm not going to pay this debt because I 12 don't owe it. I don't owe it. It was for a service 13 they could not provide.</p> <p>14 Q. I think though at some point, you said you did 15 place a call to I. C. System, right?</p> <p>16 A. Yes, sir, more than one. I mean, I had to call 17 one of the people back that called me and left a 18 message, I think. And I called them back, and then 19 they got me on the phone one day when I was traveling. 20 I answered, and we had a long conversation while I was 21 traveling. So I didn't make any notes about that, but 22 I had some conversations with I. C. Systems.</p> <p>23 Q. Now let me show you another -- I think it's this</p>
<p>Page 35</p> <p>1 Q. Yeah. So that would have been the number that 2 you called?</p> <p>3 A. Probably.</p> <p>4 Q. Probably. That makes sense, right? I mean, you 5 didn't go on the internet and search for a different 6 number, did you?</p> <p>7 A. No, sir.</p> <p>8 Q. All right. And do you have any recollection of 9 how long after you received this letter that you would 10 have called I. C. System?</p> <p>11 A. No, sir, I don't.</p> <p>12 Q. Within days, weeks?</p> <p>13 A. I would think days because it always upset me to 14 see that, and I usually called. And I probably called 15 AT&T on the same day too.</p> <p>16 Q. So in response to this letter from I. C. System, 17 you would have called AT&T again?</p> <p>18 A. Probably, because I called them several times.</p> <p>19 Q. Do you have a specific recollection of that or 20 are you just thinking that's probably what you did 21 because that's what you had been doing?</p> <p>22 A. Because that's what I had been doing, that's 23 correct.</p>	<p>Page 37</p> <p>1 one. Can you see that one okay?</p> <p>2 A. Yes, sir.</p> <p>3 Q. All right. So this is Exhibit 3, and this one 4 says "settlement offer." Do you see that?</p> <p>5 A. Yes, sir.</p> <p>6 Q. All right. And it has a date under that of 7 February 11, 2021, which is -- I think it's -- I can 8 double check here. So that's about a month after the 9 first letter, right?</p> <p>10 A. Yes, sir. Pretty close.</p> <p>11 Q. Yeah, pretty close. So do you remember 12 receiving that letter?</p> <p>13 A. Yes, sir. The settlement that they were 14 offering to reduce it, I think -- I would have to read 15 on here, but it seems like it was \$75 or something like 16 that. Yes, the amount of 75.67. And I called them at 17 that time and told them that I would not pay that, not 18 75.67, not 151.33, because I did not owe it.</p> <p>19 Q. Do you remember having any conversation with 20 anyone at I. C. System about credit reporting?</p> <p>21 A. Not specifically, not -- not a certain person, 22 no, sir.</p> <p>23 Q. Well, do you recall having a conversation with</p>

<p style="text-align: right;">Page 38</p> <p>1 anyone at I. C. System who told you that I. C. System 2 wouldn't credit report the account?</p> <p>3 A. A lady told me on a call that they do not report 4 to the credit bureaus, that I. C. System does not 5 report to the credit bureau.</p> <p>6 Q. Are you sure that's what was said?</p> <p>7 A. Yes, sir.</p> <p>8 Q. I think I asked you earlier if you reviewed any 9 call recordings or anything like that before your 10 deposition today, and you indicated you didn't, 11 correct?</p> <p>12 A. I did.</p> <p>13 Q. You did?</p> <p>14 A. I did hear it, yes.</p> <p>15 Q. You did hear the call recordings today?</p> <p>16 A. Not today.</p> <p>17 Q. When?</p> <p>18 A. I'm not sure, but it's been a few weeks ago, 19 that recording. And the lady said we do not report to 20 credit bureaus.</p> <p>21 Q. Do you remember her saying that during the call 22 as well?</p> <p>23 A. Probably.</p>	<p style="text-align: right;">Page 40</p> <p>1 the person at I. C. System who indicated that I. C. 2 System doesn't credit report?</p> <p>3 A. I'm sure it was before because I had applied for 4 a credit card. And when -- they declined me, and I was 5 embarrassed to death. And when I looked -- when I went 6 back to Credit Karma to look but I don't know what the 7 date was, I. C. Systems/AT&T U-Verse was on my credit 8 report.</p> <p>9 Q. Okay. So if I understand correctly -- and by 10 the way, if at any point during this whole process -- 11 I'm not going to sit here, and I promise you we won't 12 be going for more than another hour at best, okay? But 13 if at any point during this process you need to take a 14 five-minute break or whatever, you can just let me know 15 and I will be happy to do that.</p> <p>16 A. Thank you so much, but I'm good.</p> <p>17 Q. So if I understand what you are telling me 18 correctly, before you ever heard from I. C. System, you 19 had learned that I. C. System had in fact credit 20 reported the AT&T account; is that right?</p> <p>21 A. I'm not going to say that's right because I'm 22 not sure of the date.</p> <p>23 Q. Okay. Well, because the reason I ask is you</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. Well, I mean, if I understand correctly, that 2 was a pretty important thing for you. You said you 3 were trying to rebuild your credit after your husband's 4 death?</p> <p>5 A. Yes, sir. Yes, but they told me they did not 6 report to the credit bureau.</p> <p>7 Q. Right. And I will represent to you that that 8 call was in early March of 2021. And so when you had 9 that conversation with that person in early March of 10 2021, did you come away with the understanding that I. 11 C. System wouldn't be credit reporting you?</p> <p>12 A. I did.</p> <p>13 Q. Did that -- I hate to use the word comfort, but 14 did that make you feel at least a little better?</p> <p>15 A. No, sir, because it was still there. And I was 16 just trying to get it off my credit report period. I 17 just wanted it to go away.</p> <p>18 Q. Now do you remember -- you talked about this 19 Penny feature of Credit Karma and at some point 20 learning through that that I. C. System had credit 21 reported you.</p> <p>22 A. Yes.</p> <p>23 Q. Was that before or after you had the call with</p>	<p style="text-align: right;">Page 41</p> <p>1 testified that there was this conversation you had with 2 someone at I. C. System, and you were told by that 3 person that I. C. System doesn't credit report, right?</p> <p>4 A. That's correct.</p> <p>5 Q. And it seems that if you were advised by the 6 Credit Karma Penny before that call that I. C. System 7 had in fact credit reported, that would have been 8 something that seemed really strange given the fact 9 this woman was telling you I. C. System doesn't credit 10 report. Are you following me?</p> <p>11 A. Yes, sir, I do follow you. But there is one 12 other thing to it. It also said AT&T U-Verse on there 13 as well on that credit report, and then it had I. C. 14 Systems. So I didn't know if AT&T put it on there or 15 if I. C. Systems put it on there because it was listed 16 as an AT&T account on the credit report. I didn't know 17 if they reported it or if it came from I. C. Systems.</p> <p>18 Q. Okay.</p> <p>19 A. Showing that they were the collection agency. I 20 didn't know.</p> <p>21 Q. So when you had that conversation and the woman 22 -- I think it was a woman, right?</p> <p>23 A. Yes, it was.</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. When she said that I. C. System doesn't credit 2 report AT&T credit reports, right?</p> <p>3 A. I got that impression from her, but that I. C. 4 System would not show it as I. C. System that I was in 5 debt to.</p> <p>6 Q. Okay. And so I guess then it makes sense to you 7 because you weren't certain from that credit card Penny 8 thing whether it was AT&T and I. C. System that had 9 reported it, right?</p> <p>10 A. Yes, sir. That's correct.</p> <p>11 Q. That clears that up for me. I appreciate that. 12 Now I want to make sure I understand that you testified 13 that you had sent a letter -- when you got the letter 14 from the first collection agency, you put together a 15 dispute of some sort?</p> <p>16 A. Yes, sir. I wrote it on a piece of tablet paper 17 and attached it to their bill and sent it back to them 18 with all my account numbers and the dates that I had 19 ordered the service and the dates that they told me 20 that it was not available in my area and that I never 21 received the service and to please verify that with 22 AT&T. I never heard from them again.</p> <p>23 Q. Okay. And you didn't do that with I. C. System</p>	<p>1 something on your credit report. Did you contact any 2 of the credit reporting agencies at that point?</p> <p>3 A. No, sir. And I'm not sure of that date of 2020. 4 I just know that I applied for a Belk's credit card in 5 2020, and they declined it.</p> <p>6 Q. Do you remember when in 2020 that was with Belk?</p> <p>7 A. It would have been at the end of the year, 8 probably during the Christmas sales.</p> <p>9 Q. Christmas of 2020?</p> <p>10 A. Possibly.</p> <p>11 Q. Possibly?</p> <p>12 A. I can't be absolutely sure.</p> <p>13 Q. Well, again, I told you I grew up in Wisconsin. 14 So it was easier to know what time of year it was in 15 Wisconsin because everything was either dead because it 16 was winter or everything was alive because it was 17 summer. We only have two seasons in Wisconsin. So 18 down here, I live in Florida and so it's a little 19 different. I think we only have two seasons here, 20 summer and not summer.</p> <p>21 A. Yes, sir.</p> <p>22 Q. Do you recall having any other -- we talked 23 about one conversation you had with someone at I. C.</p>
<p style="text-align: right;">Page 43</p> <p>1 though, correct?</p> <p>2 A. No, sir, I didn't.</p> <p>3 Q. Okay.</p> <p>4 A. But I called them.</p> <p>5 Q. Right. I understand.</p> <p>6 A. I did call them, yes.</p> <p>7 Q. I understand. Now when you spoke to this person 8 at I. C. System who indicated that I. C. System doesn't 9 credit report, that AT&T does, had you at that point 10 talked to an attorney at all?</p> <p>11 A. No, sir. Oh, wait a minute. I don't think I 12 had.</p> <p>13 Q. Well, and again the other thing that I wanted to 14 make clear to you is that what I'm not doing here is 15 trying to impose some sort of memory exam on you. I 16 wouldn't want anyone to do that to me. And so I'm just 17 trying to find out as much as you can remember, okay?</p> <p>18 A. Yes, sir. Thank you.</p> <p>19 Q. Did you -- when you found that was on your 20 credit report, did you contact -- let's go back and 21 let's say it was around the time of this letter or 22 before that, in February of 2021. I think you said at 23 the end of 2020 is when you think you learned there was</p>	<p>1 System. Do you recall any other conversations with 2 someone at I. C. System?</p> <p>3 A. Yes, sir. A lady called when I was traveling, 4 and she was very nice. And I told her the story. I 5 was probably on the phone with her for several minutes, 6 maybe 15. And I was trying to explain to her why I was 7 not going to pay it, and she seemed to have all the 8 sympathy in the world and just hated it so bad for me. 9 But apparently she -- I'm not sure if she called first 10 or the lady that said they didn't do the credit 11 reporting called first. I don't remember who was first 12 that I talked to, but I know that I talked to two 13 people there at length about my issue.</p> <p>14 Q. Now do you remember if both of those were based 15 on calls that you received or calls that you made? I 16 think you said that the first one --</p> <p>17 A. I think I called back on one, and I think I 18 answered one in my car. But don't hold me to that, but 19 I just know I talked to two people, two different 20 people.</p> <p>21 Q. I understand. Was there a time that you learned 22 that I. C. System had in fact credit reported your 23 debt?</p>

12 (Pages 42 - 45)

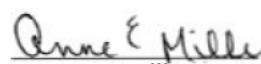
<p style="text-align: right;">Page 46</p> <p>1 A. Yes, sir. From Penny at Credit Karma, that was 2 later after the initial turndown from Belk's. I got 3 notice from Penny, but I'm not sure what the date was 4 or how long it was after I was turned down that I got a 5 notification from Credit Karma, said my credit report 6 needed some work because there was a collection on my 7 credit report that had not been paid.</p> <p>8 Q. Do you believe that was before that you learned 9 that, that I. C. System was actually credit reporting 10 the account, before or after you had that initial 11 conversation with the woman who said that I. C. System 12 doesn't credit report?</p> <p>13 A. No, sir. I don't remember because she 14 volunteered that because I told her that it was on my 15 credit report. I didn't ask her did I. C. Systems 16 report that on my credit. I didn't ask her 17 specifically that. I told her it was on my credit, and 18 she said I. C. Systems doesn't report to the credit 19 bureau.</p> <p>20 Q. Is that something you remember her saying today?</p> <p>21 A. I do remember her saying that.</p> <p>22 Q. Because if I understand correctly, from what we 23 have talked about today, it seems like you were</p>	<p style="text-align: right;">Page 48</p> <p>1 letter from I. C. System and then this second one that 2 came in February of 2021. Do you remember receiving 3 any other letters from I. C. System?</p> <p>4 A. Possibly because there was a few months there 5 where I did hear from them pretty often. But I just 6 quit opening them because I had so many conversations 7 with -- and I'm not sure how many they sent. Maybe 8 one. But if they sent a letter, I stopped reading them 9 because it was very upsetting to me because I had many 10 conversations, lengthy conversations, telling them that 11 I didn't owe this debt and tried to explain to them why 12 I did not owe this debt. And it seemed to me like all 13 they had to do was to look and see why I didn't owe 14 this debt because I tried to explain to them it wasn't 15 available in my area. So if they had just checked with 16 AT&T, it seems like they would have discovered that. 17 If somebody disputes something long enough, you would 18 think they would say, "Wait a minute. We need to check 19 and see if this is the truth."</p> <p>20 Q. If I understand, if we go back to -- I think 21 this was Exhibit 4. This was all the way back in 2018 22 that you had had leading up to this point in November 23 of 2018 several conversations with various people at</p>
<p style="text-align: right;">Page 47</p> <p>1 certainly upset that AT&T was charging you for the 2 service that you never had. But it seems to me your 3 biggest concern was trying to protect your credit; is 4 that right?</p> <p>5 A. I was concerned about trying to protect my 6 credit, but if you have a collection on it, it does a 7 number on your credit report. You can't build any 8 credit if you have a collection listed on your credit 9 report.</p> <p>10 Q. Right. And you found that out when you tried to 11 get the Belk card, right?</p> <p>12 A. Or shortly thereafter because I looked it up. 13 The Credit Karma, I can go in at any time and just 14 punch in my user name and password, and I can look at 15 anything that's on my credit report. That's going to 16 affect my credit. Like if you are trying to get a 17 credit card and they do a hard inquiry on your credit 18 report, then it makes your numbers drop. But if I look 19 at my own record, it doesn't affect my credit. So I 20 check it frequently. But I'm not sure of the dates 21 that I. C. Systems had that on there.</p> <p>22 Q. Right. I understand. I do understand. Now I 23 showed you two different letters, the January 2021</p>	<p style="text-align: right;">Page 49</p> <p>1 AT&T who apologized to you for billing, right?</p> <p>2 A. Yes, sir. They did.</p> <p>3 Q. And then you got this November 18, 2018, letter 4 saying that you owe them money and we're going to send 5 you to collections, right?</p> <p>6 A. Yes, sir, basically.</p> <p>7 Q. And then you called into AT&T on November 27th 8 of 2018 and ultimately spoke to someone named Monique 9 who then told you, "well, you owe the money," right?</p> <p>10 A. Yes, she did.</p> <p>11 Q. Right. After these other AT&T employees had 12 been apologizing to you and leading you to believe that 13 it would be handled, right?</p> <p>14 A. Yes, sir.</p> <p>15 Q. So it seems like AT&T had a tough time deciding 16 whether or not you owed the debt?</p> <p>17 A. Well, seems the final straw was that I did owe 18 the debt.</p> <p>19 Q. Let me show you this letter. Okay. Now this is 20 Exhibit 2 to your deposition. I'm going to make this 21 smaller so that we can see more of it. Okay. Now let 22 me show you the bottom here. Is that your signature 23 here?</p>

13 (Pages 46 - 49)

<p style="text-align: right;">Page 50</p> <p>1 A. Yes, sir.</p> <p>2 Q. All right. Now we'll go back to the top. And</p> <p>3 it says "via certified mail" and it says "Trans Union</p> <p>4 Consumer Relation." Do you see that at the top?</p> <p>5 A. Yes, sir.</p> <p>6 Q. Is this a letter that you sent?</p> <p>7 A. Yes, sir.</p> <p>8 Q. And let me go down again here. I don't -- do</p> <p>9 you know when you sent that?</p> <p>10 A. No, sir. I don't know the date that I sent it.</p> <p>11 I don't see the date on the letter.</p> <p>12 Q. I don't see a date on the letter. It's my</p> <p>13 understanding based upon information that's been</p> <p>14 provided in this case that this was sent in May of</p> <p>15 2022. Does that --</p> <p>16 A. That's probably correct, yes, sir.</p> <p>17 Q. Now by that time in May of 2022, had I. C.</p> <p>18 System stopped contacting you?</p> <p>19 A. I think maybe March of 2022, I'm thinking, may</p> <p>20 have been the last lengthy conversation I had with IC</p> <p>21 Systems, but the debt remained on my credit report.</p> <p>22 And I was just trying to find a way to resolve it.</p> <p>23 Q. So you sent this letter to Trans Union. Did you</p>	<p style="text-align: right;">Page 52</p> <p>1 A. I had decided to find out what my options were,</p> <p>2 how anybody could help me because I felt helpless,</p> <p>3 hopeless. I had talked to everyone that I knew to talk</p> <p>4 to. I even called the Alabama attorney general's</p> <p>5 office to get advice, and she said she would send me a</p> <p>6 form. And reading over the form, I didn't see where</p> <p>7 any of it would be helpful. So I called an</p> <p>8 acquaintance who handled something for me that's an</p> <p>9 attorney. He handled something for me when my husband</p> <p>10 died, and I told him my situation. And I said, "Is</p> <p>11 there any hope for me, help for me? Can you recommend</p> <p>12 anything?" And he said, "Yeah. I'm going to send you</p> <p>13 to somebody." So he gave me some numbers of Mr. Seals</p> <p>14 and Julia Cochrun and two others. And I decided on --</p> <p>15 I liked the name Whitney. So I made contact with him</p> <p>16 and explained my situation to him. And he said --</p> <p>17 MR. SEALS: Whoa, whoa.</p> <p>18 A. -- he could help me.</p> <p>19 Q. I think Mr. Seals' parents named him Whitney</p> <p>20 just for that purpose.</p> <p>21 MR. SEALS: Exactly. They were pretty much</p> <p>22 long game, yeah.</p> <p>23 MR. GOLDEN: Like what name can we give him</p>
<p style="text-align: right;">Page 51</p> <p>1 send a letter like this to I. C. System?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Now the letter that you sent to I. C. System,</p> <p>4 did you keep a copy of that?</p> <p>5 A. Probably one in my file.</p> <p>6 Q. When you say your file, the file you have at</p> <p>7 home?</p> <p>8 A. And/or my attorney's file because I had him to</p> <p>9 review my letters. And he actually mailed them for me.</p> <p>10 MR. SEALS: Make sure you don't say what we</p> <p>11 talked about.</p> <p>12 THE WITNESS: Oh, no, sir.</p> <p>13 Q. (BY MR. GOLDEN) I'm not entitled to that, and</p> <p>14 I'm not seeking that.</p> <p>15 MR. SEALS: And for the record, I don't</p> <p>16 feel like you are asking for that.</p> <p>17 Q. (BY MR. GOLDEN) Right. And at some point</p> <p>18 then -- again, I think actually it was May 11th that</p> <p>19 this was dated. That was my memory, and counsel will</p> <p>20 correct me if I'm wrong. May 11, 2022?</p> <p>21 MR. SEALS: Sounds right.</p> <p>22 Q. (BY MR. GOLDEN) At some point before that then,</p> <p>23 you had finally decided to see a lawyer, right?</p>	<p style="text-align: right;">Page 53</p> <p>1 that will ensure success in the future?</p> <p>2 MR. SEALS: That's it.</p> <p>3 MR. GOLDEN: My parents didn't have that</p> <p>4 same conversation.</p> <p>5 Q. So if I understand correctly, this letter was</p> <p>6 something that came out of -- let me go back and ask</p> <p>7 that a different way. So this was a letter that your</p> <p>8 attorney helped you put together?</p> <p>9 A. Well, he reviewed it carefully.</p> <p>10 Q. Okay. That's fair enough. So you drafted this.</p> <p>11 You had your attorney review it, and then you mailed</p> <p>12 it?</p> <p>13 A. No, sir. He told me --</p> <p>14 MR. SEALS: Not he told you.</p> <p>15 A. He mailed it for me.</p> <p>16 Q. (BY MR. GOLDEN) There you go.</p> <p>17 A. We sent it certified mail. And I paid for the</p> <p>18 postage, and he mailed it.</p> <p>19 Q. All right. Now your testimony is that you sent</p> <p>20 -- you believe you sent a letter to I. C. System as</p> <p>21 well, right?</p> <p>22 A. Yes, sir.</p> <p>23 Q. Around the same time as this one?</p>

<p style="text-align: right;">Page 54</p> <p>1 A. Yes, sir.</p> <p>2 Q. Would it have been different than this one?</p> <p>3 A. No, sir. Probably basically said the same</p> <p>4 thing, that it was a debt that I didn't owe and that I</p> <p>5 was trying to clear it up and trying to get it off my</p> <p>6 credit.</p> <p>7 Q. Did you hear back from Trans Union in response</p> <p>8 to this letter?</p> <p>9 A. Yes, sir, I did.</p> <p>10 Q. How did you hear back from Trans Union? Was it</p> <p>11 a letter?</p> <p>12 A. They sent a letter back, saying that my debt had</p> <p>13 been verified.</p> <p>14 Q. Do you know how long it was after you sent this?</p> <p>15 A. It was weeks before I heard -- I sent all of the</p> <p>16 credit bureaus the letter, and I. C. Systems. And it</p> <p>17 was sometime -- some responded fairly quickly. Others</p> <p>18 did not respond for a while.</p> <p>19 Q. How many letters like this did you send out or</p> <p>20 have your attorney send?</p> <p>21 A. Four?</p> <p>22 MR. SEALS: Your testimony.</p> <p>23 A. Three or four.</p>	<p style="text-align: right;">Page 56</p> <p>1 could choose which ones that I sent them. I sent all</p> <p>2 of them. Just the last four of my Social, driver's</p> <p>3 license, my power bill and my DirecTV bill to see that</p> <p>4 they had the right person. They wanted to make sure</p> <p>5 they had the right person. And then once I sent all</p> <p>6 that information, I did not hear anything else from</p> <p>7 Experian. They did not respond to the last letter that</p> <p>8 I sent.</p> <p>9 Q. Did you hear anything back from I. C. System in</p> <p>10 response to your letter?</p> <p>11 A. Yes, sir. They said the debt had been</p> <p>12 investigated, and it was a legitimate debt.</p> <p>13 Q. Was that a letter from I. C. System?</p> <p>14 A. I believe it was, sir.</p> <p>15 Q. Do you know if Experian removed it from your</p> <p>16 credit report?</p> <p>17 A. No, sir. The only two that I can see on my</p> <p>18 credit report is Equifax and Trans Union. Those are</p> <p>19 the only two reporting credit unions that I can see on</p> <p>20 Credit Karma. So I don't know if Experian took it off.</p> <p>21 I never got any response on the last letter.</p> <p>22 Q. All right. So do you know -- when is the last</p> <p>23 time you got an update from Credit Karma or Penny on</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. (BY MR. GOLDEN) All right.</p> <p>2 A. I could name them for you but --</p> <p>3 Q. Yeah. So you sent one to Trans Union?</p> <p>4 A. Yes, sir.</p> <p>5 Q. I understand you sent one to I. C. System?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Do you know who else you sent it to?</p> <p>8 A. Yes, sir. Equifax and Experian.</p> <p>9 Q. Okay. And did you get responses from each one</p> <p>10 of them?</p> <p>11 A. Yes, sir.</p> <p>12 Q. So this is the response you got -- or I'm sorry.</p> <p>13 This is not the response you got from Trans Union. You</p> <p>14 testified about that though. You said that it had been</p> <p>15 verified as accurate, right?</p> <p>16 A. Yes, sir.</p> <p>17 Q. What did you get from Equifax? Do you recall?</p> <p>18 A. Equifax said that they investigated and that</p> <p>19 they found the debt not to be something that I owed,</p> <p>20 was not accurate. And then from Experian, I got a</p> <p>21 letter stating that they needed more information on me</p> <p>22 to document, that would identify me; driver's license,</p> <p>23 Social Security card, mailing address, power bill. I</p>	<p style="text-align: right;">Page 57</p> <p>1 how your credit report looks with respect to this</p> <p>2 account?</p> <p>3 A. Yesterday.</p> <p>4 Q. Yesterday?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. So as of yesterday, what can you tell me</p> <p>7 about whether it's being credit reporting?</p> <p>8 A. Equifax has my credit score at 762. Trans Union</p> <p>9 has me at 640.</p> <p>10 Q. Do you know if this specific AT&T debt is still</p> <p>11 on your credit report?</p> <p>12 A. No, sir. It was removed.</p> <p>13 Q. So it was removed by all of them?</p> <p>14 A. Yes, sir, I believe so.</p> <p>15 Q. Again, I mean, if I understand correctly --</p> <p>16 A. I don't see it. There is no collections on my</p> <p>17 credit report at this time.</p> <p>18 Q. Okay. Are you able to -- and I want to make</p> <p>19 sure I understand this. Are you able to see what's on</p> <p>20 your Experian credit report?</p> <p>21 A. No, sir. I don't know if they don't report to</p> <p>22 Credit Karma or if Credit Karma does not have access to</p> <p>23 Experian. The only two that they show me is the Trans</p>

<p style="text-align: right;">Page 58</p> <p>1 Union and the Equifax.</p> <p>2 Q. Do you know if this account is on the Experian</p> <p>3 credit report?</p> <p>4 A. No, sir. But there is nothing showing on my</p> <p>5 credit report. So they show me an entire copy of my</p> <p>6 credit report. But the two credit reporting numbers</p> <p>7 that I get, my -- whatever that's called where your 762</p> <p>8 or 640, that's only two, Trans Union and Equifax.</p> <p>9 Q. I think that's called the FICA score.</p> <p>10 A. Whatever it is.</p> <p>11 Q. Yeah. So let me ask you: As part of this</p> <p>12 lawsuit, are you claiming damages as a result of what</p> <p>13 I.C. System did in this case?</p> <p>14 A. Yes, sir.</p> <p>15 Q. Are you able to tell me what in your own words</p> <p>16 those damages are?</p> <p>17 A. Yes, sir. I have lost lots of sleep. I have</p> <p>18 cried lots of tears. I have had shingles to erupt on</p> <p>19 my body from being distraught and upset. Feeling</p> <p>20 hopeless, helpless, embarrassed, humiliated. My</p> <p>21 daughters were present at one point when I applied for</p> <p>22 a Belk's card, and the lady, sales lady, came back and</p> <p>23 said I was declined. I started crying. My children</p>	<p style="text-align: right;">Page 60</p> <p>1 A. Yes, sir.</p> <p>2 Q. Were there any other places where you applied</p> <p>3 for a credit card and actually received one?</p> <p>4 A. Not prior to them removing the collection from</p> <p>5 my credit report. I did apply at Penny's suggestion, I</p> <p>6 guess computer generated, that I apply to Capital One,</p> <p>7 but that was about the same time that this was taken</p> <p>8 off my credit. And they thought if I had a credit</p> <p>9 card, that would be an easier way to improve my credit</p> <p>10 score. And I did apply for Capital One about the same</p> <p>11 time I applied for the Belk's, and they were both</p> <p>12 issued. They were approved. I did not get declined by</p> <p>13 either after they removed this from my credit.</p> <p>14 Q. Did you have credit cards at the time?</p> <p>15 A. At the time of?</p> <p>16 Q. Yeah. That wasn't great, was it?</p> <p>17 A. I did not have any credit cards prior to. Since</p> <p>18 2009.</p> <p>19 Q. So when you finally got approved for the Belk's</p> <p>20 card and the Kohl's card, was that the first time you</p> <p>21 had had a credit card?</p> <p>22 A. I didn't get a Kohl's. I didn't reapply to</p> <p>23 Kohl's, but I did reapply to Belk's. And I applied to</p>
<p style="text-align: right;">Page 59</p> <p>1 got very upset because they couldn't understand, and</p> <p>2 they didn't know anything about what I was fighting</p> <p>3 with my credit report. And it had been ten years after</p> <p>4 a bankruptcy before my husband died, and I thought I</p> <p>5 could apply for a credit card and not have any issue.</p> <p>6 And then it came back declined, and I did that twice to</p> <p>7 Belk's and twice to Kohl. And the last time at Belk's</p> <p>8 was immediately after this was removed from my credit</p> <p>9 report, and they approved my card, the first credit</p> <p>10 card I have had in all those years. But it was only</p> <p>11 after the letters from the attorney and me speaking to</p> <p>12 an attorney that they removed it from my credit report,</p> <p>13 and I was able to have a Belk's credit card.</p> <p>14 Q. When was that that you got that Belk's credit</p> <p>15 card?</p> <p>16 A. That would have been the latter part of 2022,</p> <p>17 maybe early fall. Or whenever they took it off, I</p> <p>18 applied right after that. It hasn't been that long ago</p> <p>19 because it hasn't been gone that long.</p> <p>20 Q. When this information was on your credit report,</p> <p>21 were you -- I know you indicated that you had been</p> <p>22 denied a credit card by Belk's twice and by Kohl's</p> <p>23 twice. I think that's what you said?</p>	<p style="text-align: right;">Page 61</p> <p>1 Capital One, and that was the first credit card that</p> <p>2 was issued to me since 2009.</p> <p>3 Q. Since 2009?</p> <p>4 A. Yes, sir.</p> <p>5 Q. When was the bankruptcy?</p> <p>6 A. 2009. Two weeks before my husband passed.</p> <p>7 Q. And what type of bankruptcy was filed? Was it a</p> <p>8 Chapter 7?</p> <p>9 A. I'm not sure. We only filed against medical</p> <p>10 bills that totaled 41,000, and I didn't file against my</p> <p>11 house or my car or anything like that, just against the</p> <p>12 medical bills because he was about to have another big</p> <p>13 surgery, which he did not think that he would survive.</p> <p>14 So he said, "Please file bankruptcy. I don't want to</p> <p>15 leave you with this debt, credit card debt." So we did</p> <p>16 that. And then three days after they approved the</p> <p>17 bankruptcy, he died.</p> <p>18 Q. And then I assume for some time then after the</p> <p>19 bankruptcy, you had issues with your credit, right?</p> <p>20 A. I don't think so because I got some life</p> <p>21 insurance when he died, which I had to get an attorney</p> <p>22 to help me get it all. And then my life insurance</p> <p>23 proceeds were paid back to my credit card companies</p>

<p style="text-align: right;">Page 62</p> <p>1 that I filed against. They took the proceeds from my 2 life insurance and paid those debts off. But I didn't 3 have credit cards because they said even though we paid 4 them off, the bankruptcy would remain on my record. So 5 I never applied for a credit card.</p> <p>6 Q. Do you know when the bankruptcy came off your 7 report?</p> <p>8 A. Yes, sir. I think it was -- Doug died on March 9 the 9th of 2009, and I think I didn't see it any more 10 after maybe May or June of 2019.</p> <p>11 Q. Now is it accurate for me to say that to the 12 extent that you had any possession of any documents 13 related to this case, including any letters to or from 14 I. C. System or anybody else regarding this account, 15 that you would have given copies or the originals to 16 your attorney?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Were you -- you seem like the kind of person who 19 is pretty organized. So would that have been something 20 that if you had sent a letter, you wanted to make sure 21 that you kept a copy?</p> <p>22 A. Actually I did get copies, two of the letters 23 that we sent to the credit bureau and to I. C. System.</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Yes. 2 Q. I just wanted to make sure that was clear on the 3 record. 4 A. Yes. The amount is exactly the same. 5 MR. SEALS: Okay. That's it. 6 MR. GOLDEN: I appreciate that.</p> <p>7</p> <p>8 (Deposition concluded at 10:32 a.m.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p>
<p style="text-align: right;">Page 63</p> <p>1 I'm sure that he gave me copies of those letters, and I 2 feel like we have retained them in the file.</p> <p>3 MR. GOLDEN: Okay. I think that's all the 4 questions I have for you, Ms. Dorsey. I appreciate 5 your patience.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 MR. SEALS: Mr. Golden, I'm not sure if I 8 have anything or not. Can I have just a moment?</p> <p>9 MR. GOLDEN: Of course.</p> <p>10 (Recess taken.)</p> <p>11 MR. SEALS: I was digging through, and I 12 believe you produced this, Mr. Golden. I was digging 13 through my file.</p> <p>14</p> <p>15 EXAMINATION BY MR. SEALS:</p> <p>16 Q. Was the name of the first collection agency 17 Franklin Collection Service, Inc?</p> <p>18 A. Yes. That sounds familiar.</p> <p>19 Q. And I have got one letter that you provided to 20 me dated October 2nd, 2019. Would that have been 21 roughly when they contacted you?</p> <p>22 A. Around the time, yes.</p> <p>23 Q. Did that also deal with AT&T U-Verse Net?</p>	<p style="text-align: right;">Page 65</p> <p>1 C E R T I F I C A T E</p> <p>2</p> <p>3 STATE OF ALABAMA)</p> <p>4 JEFFERSON COUNTY)</p> <p>5</p> <p>6 I hereby certify that the above and foregoing 7 proceeding was taken down by me by stenographic means, 8 and that the questions and answers therein were 9 produced in transcript form by computer aid under my 10 supervision, and that the foregoing represents, to the 11 best of my ability, a true and correct transcript of 12 the proceedings occurring on said date at said time.</p> <p>13 I further certify that I am neither of counsel 14 nor of kin to the parties to the action; nor am I in 15 anywise interested in the result of said case.</p> <p>16 Signed the 11th day of May, 2023.</p> <p>17</p> <p>18</p> <p>19  Anne E. Miller</p> <p>20</p> <p>21 ACCR #486</p> <p>22 Expires 9/30/23</p> <p>23 My commission expires 11/19/23</p>

<p style="text-align: right;">Page 66</p> <p>1 W. Whitney Seals 2 whitney@cochrunseals.com 3 May 12, 2023 4 RE: Dorsey, Sharon v. Trans Union, LLC And I.C. System, Inc. 5 5/11/2023, Sharon Dorsey (#5909018) 6 The above-referenced transcript is available for 7 review. 8 Within the applicable timeframe, the witness should 9 read the testimony to verify its accuracy. If there are 10 any changes, the witness should note those with the 11 reason, on the attached Errata Sheet. 12 The witness should sign the Acknowledgment of 13 DepONENT and Errata and return to the deposing attorney. 14 Copies should be sent to all counsel, and to Veritext at 15 cs-southeast@veritext.com. 16 17 Return completed errata within 30 days from 18 receipt of testimony. 19 If the witness fails to do so within the time 20 allotted, the transcript may be used as if signed. 21 22 Yours, 23 Veritext Legal Solutions 24 25</p>	<p style="text-align: right;">Page 68</p> <p>1 Dorsey, Sharon v. Trans Union, LLC And I.C. System, Inc. 2 Sharon Dorsey (#5909018) 3 ACKNOWLEDGEMENT OF DEPONENT 4 I, Sharon Dorsey, do hereby declare that I 5 have read the foregoing transcript, I have made any 6 corrections, additions, or changes I deemed necessary as 7 noted above to be appended hereto, and that the same is 8 a true, correct and complete transcript of the testimony 9 given by me. 10 11 _____ 12 Sharon Dorsey Date 13 *If notary is required 14 SUBSCRIBED AND SWORN TO BEFORE ME THIS 15 _____ DAY OF _____, 20____. 16 17 18 _____ 19 NOTARY PUBLIC 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 67</p> <p>1 Dorsey, Sharon v. Trans Union, LLC And I.C. System, Inc. 2 Sharon Dorsey (#5909018) 3 E R R A T A S H E E T 4 PAGE ____ LINE ____ CHANGE _____ 5 _____ 6 REASON _____ 7 PAGE ____ LINE ____ CHANGE _____ 8 _____ 9 REASON _____ 10 PAGE ____ LINE ____ CHANGE _____ 11 _____ 12 REASON _____ 13 PAGE ____ LINE ____ CHANGE _____ 14 _____ 15 REASON _____ 16 PAGE ____ LINE ____ CHANGE _____ 17 _____ 18 REASON _____ 19 PAGE ____ LINE ____ CHANGE _____ 20 _____ 21 REASON _____ 22 _____ 23 _____ 24 Sharon Dorsey Date 25</p>	

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DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

EXHIBIT 1

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.



Creditor:
Account No.:
I.C. System Reference No.:
[REDACTED]
ATT U-Verse

COLLECTION NOTICE

1/8/2021

BALANCE DUE:

\$151.33

Sharon Dorsey:

Your delinquent account has been turned over to this collection agency. ATT U-Verse is both the original and current creditor to whom this debt is owed.

The account information is scheduled to be reported to the national credit reporting agencies in your creditor's name. You have the right to inspect your credit file in accordance with federal law. I.C. System will not submit the account information to the national credit reporting agencies until the expiration of the time period described in the notice below.

Please tear off the bottom portion of this letter and return it with your payment.

If you will be receiving a tax refund and would like to use it to pay your account, please call us to make payment arrangements.

We are a debt collector attempting to collect a debt and any information obtained will be used for that purpose.

NOTICE

Unless you notify this office within 30 days after receiving this notice that you dispute the validity of this debt or any portion thereof, we will assume this debt is valid. If you notify us in writing within 30 days from receiving this notice that you dispute the validity of this debt or any portion thereof, we will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such judgment or verification. If you make a request in writing within 30 days after receiving this notice we will provide you with the name and address of the original creditor, if different from the current creditor.

If you feel you are or have been a victim of Theft of Identity, please call AT&T directly.

This does not contain a complete list of the rights consumers have under Federal, State, or Local laws.

I.C. System, Inc. | 444 Highway 96 East, PO Box 64378, St. Paul MN 55164-0378

149011-T01-510-156137641-System-47388



- For questions or payment please go to: <https://www.icsystem.com/consumer>
- Mail check or money order payable to I.C. System, Inc. with coupon below
- Call Toll-Free at 888-312-3595

P.O. Box 64437
St. Paul, MN 55164-0437
Electronic Service Requested

BALANCE DUE: **\$151.33**

I.C. System Reference No.: [REDACTED]

Address Changed?
STREET _____
CITY _____ STATE _____ ZIP _____
Billing Phone Number _____

Pay Online at
<https://www.icsystem.com/consumer>
 MAKE CHECK OR MONEY ORDER PAYABLE TO:

ORSEY
[REDACTED]
[REDACTED]

I.C. SYSTEM, INC.
PO BOX 64378
SAINT PAUL MN 55164-0378

[REDACTED]

EXHIBIT 2**VIA CERTIFIED MAIL**

TransUnion Consumer Relations
 P. O. Box 2000
 Chester, PA 19022-2000

To Whom it May Concern:

My name is Sharon Dorsey. My address is [REDACTED], Remlap, Alabama 35133. My birthdate is [REDACTED]. The last four digits of my social security number are [REDACTED]. I am enclosing a copy of my Alabama drivers license so that you know it is me writing you about this issue. I am writing because there is false or inaccurate information that is being reported on my credit report that I want investigated and removed please.

When I moved to my current address in 2018, I wanted to have AT&T service for phone and internet. I was told it was \$101.00 per month for AT&T Uverse bundled service so I applied. After I applied for that service, I learned that AT&T Uverse service was not available at my address. To this day it is still not available and I have not had that service at my current home. I got bills for AT&T Uverse (even though it was not available to me at my address) which I did not owe since I couldn't even get the service and now a collection company called IC Systems is reporting on my credit that I owe ATT Uverse \$151.00. I do not owe this money as I have never had this service and this service was never available for me to have at my home. This debt that is being reported by IC Systems is false and inaccurate.

This false information that IC Systems is reporting has caused me to get denied for a Kohl's credit card and a Belk card. The fact that this company is reporting a debt that is false and is hurting my credit when I do not owe it has caused me much stress and anxiety. Please get this off my credit.

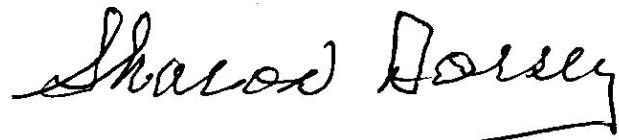
It is my understanding that you are required by the Fair Credit Reporting Act to investigate the entry on my credit report from IC Systems about the Uverse debt and respond to me after you investigate. I believe that AT&T will tell you that I cannot even get Uverse service at my house and so there's no way I owe money for a service I cannot even get. Please mail any response to my letter to my mailing address:

Sharon Dorsey
 P.O. Box 228
 Locust Fork, AL 35097

If you need more information from me. You can call me at [REDACTED] or write me and I will try my best to give you whatever information you need. If this account is not being reported on my credit report, please let me know that as well as I am concerned that this account is being reported even though I don't owe this debt and never have owed the debt.

I look forward to hearing back from you.

Sincerely,

Sharon Dorsey

Sharon Dorsey

Enclosure



Creditor:
Account No.:
I.C. System Reference No.: [REDACTED]

ATT U-Verse

SETTLEMENT OFFER

2/11/2021

BALANCE DUE:

\$151.33

Sharon Dorsey:

Would you be willing to pay 50% of the BALANCE DUE above?

To resolve the BALANCE DUE indicated above, our office will accept a reduced payment amount of \$75.67.

For more information about your account or to make payment, please visit <https://www.icsystem.com/consumer>. You may also accept this offer by calling 888-312-3595 or sending payment by mail.

If you will be receiving a tax refund and would like to use it to pay your account, please call us to make payment arrangements.

We are a debt collector attempting to collect a debt and any information obtained will be used for that purpose.

This does not contain a complete list of the rights consumers have under Federal, State, or Local laws.

I.C. System, Inc. | 444 Highway 96 East, P.O. Box 64378, St. Paul MN 55164-0378

149011-T01278-158504545-Syslaml-39925



- █ For questions or payment please go to: <https://www.icsystem.com/consumer>
- █ Mail check or money order payable to I.C. System, Inc. with coupon below
- █ Call Toll-Free at 888-312-3595

P.O. Box 64437
St. Paul, MN 55164-0437
Electronic Service Requested

BALANCE DUE: \$151.33

I.C. System Reference No.: [REDACTED]

Address Changed?
STREET _____ STATE _____ ZIP _____
CITY _____ Billing Phone Number _____

█ Pay Online at <https://www.icsystem.com/consumer>
█ MAKE CHECK OR MONEY ORDER PAYABLE TO:

SHARON DORSEY

I.C. SYSTEM, INC.
PO BOX 64378
SAINT PAUL MN 55164-0378





AT&T

SHARON DORSEY

November 08, 2018

RE: [REDACTED]

Dear SHARON DORSEY:

We recently sent you a final bill for your closed AT&T account. Perhaps you have overlooked or misplaced this bill as we are showing a balance due of \$151.33. If you have not made your payment, please do so immediately or call us to make satisfactory payment arrangements.

You can make a payment by going online at att.com/pay, using the my AT&T app (where available) on your smartphone, or also using our Interactive Voice Response system at 800-288-2020. Payments made with an AT&T representative may be subject to a \$5.00 convenience fee.

If you have equipment with a monthly fee, a letter is sent to provide details for how to return it to an authorized location. You may be billed for equipment not returned within 21 days of disconnection.

If you do not pay the total balance by the DUE BY date, your account may be referred to an outside collection agency. The outside collection agency may report your debt to credit bureaus, which may affect your credit standing. You may also be required to pay collection agency fees and attorney fees, as permitted by law. If you have any questions, please contact us at 800-288-2020.

We look forward to doing business with you in the future.

Thank you for choosing AT&T.

*Told next did not owe
spoke to Carmen. She will update file.
asked her not to let this go to collections as
I AM supplying to rebuild
credit*

FBLTR2U99C

AMOUNT DUE: \$151.33

SHARON DORSEY

Account Number [REDACTED]

Please include account number on your check.

Make Checks Payable to:

AT&T
PO BOX 5014
CAROL STREAM IL 60197-5014



7086.001.000842.01.01.0000000 NNNNNNNY 001683.001683



400040510022856960850000000015343000000015133000006
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

EXHIBIT 1-D



Delivery Appointment Details

Delivery Date*: 6/29/18 @ 8:00 am
 * Pickup: Clubs, products should be staged for pickup the morning on this date

Member Information For Delivery

Note: If a Member is not present for delivery, other designated recipients MUST be 18 years of age or older.

Delivery Service Provider Installs Inc, LLC Phone Number 877-758-4346 option 7
 Date 6/23/18 Register # 38 Transaction # 1797
 Member Name Sharon Dosey Membership # [REDACTED]
 Club # 4817 Email N/A
 Member Address [REDACTED]
 Phone Number [REDACTED] Cell Phone Number [REDACTED]

Delivery Instructions:

Haul-Away
 (check box if required)

Merchandise Description:

Brand

Item

980108624

Model

(please attach copy of receipt)

PROMOTIONAL SERVICES:

Is this part of a current promotion:

Warranty Bundle

Warranty Item # 1091017

Basic Mount Bundle

Mattress

Premium Mount Bundle

Other

4K TV Bundle

(please specify)

Limitation of Liability: By signing this form, you understand that the company or individual delivering and setting up or installing the products you have purchased at Sam's Club® is an independent contractor and is not owned or operated by Sam's Club. Sam's Club is not responsible for the actions of the company delivering and setting up or installing your products, including, but not limited to, damage caused to your products or your property as a result of the company's delivery, set up or installation services. Members are not required to use the delivery service provider referred to Sam's Club and may also choose to pick up the purchased items themselves. Redelivery fees will apply to any returned product.

Sharon Dosey

Member Signature

Checkout Supervisor (Printed)

This section to be used by Service Provider and Club Manager during product pickup processing.

Service Company

Phone Number

Service Provider Name (Printed)

Service Provider Signature

Club Member Signature